

# **EXHIBIT A**

## **(Part 1 of 3)**



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# Tinder Confidential: The Hookup App's Founders Can't Swipe Away the Past



Sam Biddle

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Ashley Terrill was in hiding the first time I heard her voice, splitting time between her Los Angeles home and a \$600-a-night room at the Beverly Wilshire Hotel. Terrill had locked her laptop and phone in a secret vault, and would only contact me on disposable phones—all because, she claimed, the estranged co-founder of Tinder was trying to destroy her. And that fear was mutual.



## Ex-VP Sues Tinder Alleging Coworker Called Her a "Whore" (And Worse)

This is definitely worse than your worst Tinder horror story: Whitney Wolfe, Tinder's former...

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Whitney Wolfe and Tinder have been legally forbidden to speak ill of one another since September of 2014, when they settled a highly public and toxic lawsuit out of court. But the foes have never reconciled, and remain deeply suspicious of one another—though both say repeatedly and consistently that they've moved on, and that they are too concerned with their respective dating apps to worry about each other.

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Since the settlement, the dating feed has expanded to include a constellation of friends, executives, and gossips. With Tinder now part of a publicly traded e-dating conglomerate and its CEO admitting freely to **opposition research against Nancy Jo Sales**, the app's inside history of spite and contentiousness remains relevant.

The accusations and speculations in this instance touch on parties ranging from Tinder's communications desk to a Russian billionaire backer of Bumble who is also in the spyware business. At the center is Ashley Terrill, a Hollywood columnist on an obsessive, possibly unhinged pursuit of what she says is the truth about Whitney Wolfe. Depending on who's doing the guessing, Terrill is the target of a secret harassment operation, the agent of a covert mudslinging campaign, or an outside observer caught up in a paranoid freakout. Whatever the case may be, in the miasma of mistrust surrounding Tinder, a lot of people with a lot of money at stake are staring into the shadows right along with her.

\* \* \*

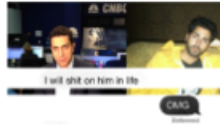
In June of last year, Whitney Wolfe, a co-founder and former vice president of marketing at Tinder, sued her former employers at Tinder, parent company IAC, and the two men who commanded the dating startup, CEO Sean Rad and former chief of marketing Justin Mateen. Wolfe alleged that after a breakup with Mateen she'd been subjected to a horrendous spell of sexual harassment and emotional bludgeoning by the company's executives, then stripped of her status as co-founder of the wildly successful app and canned.



Whitney Wolfe



Her lawsuit described a litany of male awfulness, from being called a “whore” at a company party to repeated toxic text messages from Mateen (in one, he writes “you prefer to social climb middle aged Muslim pigs”). With Wolfe’s reputation and her multi-million dollar stake in Tinder both on the line, reporters in and out of the business world pounced. Wolfe was almost universally depicted as the victim and heroine of the episode (including in articles I wrote for Valleywag), with Rad and Mateen easily cast as the creeps and aggressors. The parties quickly settled out of court. It was thrilling, but ultimately tidy.



### Every Fucked Up Text from the Tinder Sexual Harassment Lawsuit

A new legal offensive against Tinder, everyone's favorite iPhone promiscuity simulator,...

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The major stakeholders were eager to act as if the deeply lurid scandal had just disappeared, and to the press, it had. We moved on. But to those who were actually part of it, the story has continued—so long as they’re both trying to help people have sex through a touchscreen, it probably always will. Both Whitney Wolfe and her former legal opponents appear deeply anxious about each other today, in a state of existential dread about their business and personal lives. They’ll always resent each other (or worse), but with a judge forbidding them from talking about it, what can they do but stew?

Caught in the middle of this standoff is Ashley Terrill, a Los Angeles-based freelance reporter, screenwriter, and producer who’s spent the bulk of her career on film junkets and celebrity interviews. She’s also in possession of an unedited, hour-long sit-down interview with Whitney Wolfe and Sean Rad, conducted before Wolfe’s lawsuit as part of a profile she **delivered to Elle magazine in October of 2013**. In it, claims Terrill, Wolfe spoke candidly about her office romance and early role in the company.

It’s this audio recording that Terrill says is proof that Whitney Wolfe is not who she says she is—neither a victim nor a co-founder, but a fraud who parlayed a sex lawsuit into a career boost and fame. Terrill’s claims range from dubious to absurd, but her exhaustive investigation into Wolfe’s background has pumped the submerged bile between the two camps up to the surface. Though not a business reporter, Terrill is at home among the connected and app-savvy souls who make up the Los Angeles startup vanguard in “Silicon Beach.” She’s also willing to dig for dirt about Whitney Wolfe as far back as high school.

Terrill’s research is an anomaly in the saga of Wolfe vs Tinder, a rare attempt to discredit rather than lionize the plaintiff. Only once did the Whitney versus

Goliath narrative turn backwards: In July of 2014, one month after news of the lawsuit broke, TechCrunch published an article titled, simply, “Burned: The Story of Whitney Wolfe.” In it, Wolfe was cast alternately as a liar, slut, seductress, drunk, and generally unreliable (if not unsympathetic) character by anonymous sources inside Tinder. It was a textbook return salvo by Tinder’s communications desk, a c-suite counterattack that laundered personal attacks against a former coworker through a news outlet. An hour after “Burned” went up, TechCrunch announced that Sean Rad would appear as a headline speaker at the site’s upcoming Disrupt conference.

Soon after, Wolfe and the men of Tinder abruptly buried the hatchet for an undisclosed (rumored to be seven-figure) sum and a mutual non-disclosure pact. Wolfe (and a fellow Tinder co-founder Chris Gulczynski) went on to found Bumble, a Tinder clone with a twist: Men can’t message women unless the woman has made first contact. Between this novel feature, the company’s employment of women at top levels, and Wolfe’s very public departure from Tinder, her new startup has enjoyed uniformly positive press as an underdog and feminist inspiration.

Media treatment of the mothership, meanwhile, hasn’t been so kind—after looking toxic for many months due to the lawsuit, Tinder has become synonymous with smartphone sleaze, and its psychotic response to a boring *Vanity Fair* article on its role in “hookup culture” earned it few new fans. But it’s also still the gold standard in app-dating, and remains one of the most popular smartphone downloads of all time, freshly spun off by IAC into a publicly traded company, Match Group. David and Goliath both won. Yet neither side is sure that things are really over.

\* \* \*

Before Ashley Terrill ever told me her fears about being targeted by Whitney Wolfe, Wolfe told me her fears about being targeted by Terrill. After covering the lawsuit, I’d maintained a friendly SMS-based connection with Wolfe about her industry and her startup. Our text conversations rarely returned to the turmoil she’d faced at her previous company, and I’d had every reason to believe Wolfe no longer suffered over what’d happened to her at Tinder. When the subject of Tinder did come up, she’d say—just shy of performatively—that she wished Tinder only the best, in spite of it all. Wolfe’s hands were newly full with Bumble.

Then, one week this past August, Wolfe began texting me—at first seeming bemused, then nervous, then frantic—saying she’d heard from friends in L.A. (she now resides in Austin, Texas) that a writer by the name of Ashley Terrill was compiling evidence against her for some sort of of intricate character



assassination. Even more frightening was the possibility that Terrill was building her case against Wolfe with cooperation from Tinder.

Wolfe received word a writer was “going to try to make me tech’s ‘Gone Girl’ or something,” she told me over the phone. The news had reached Wolfe through a social sphere she’s maintained that keeps Rad and Mateen in its orbit, a circle of children born into affluence and seeking more through venture capital.

A source close to Wolfe told me “[Whitney] was in New York City for a business meeting, and received an urgent phone message saying ‘call me immediately’” —from none other than Alexa Dell, Sean Rad’s ex-girlfriend and heiress to the Dell computer fortune. When she reached Dell, Wolfe learned “a book was being shopped around” about her legal battle with Tinder and personal life, and that she should expect a “takedown story” coming soon from Terrill. She didn’t know when it was happening, or where it would be published—only that she was once again a target.

By this source’s account, Dell had learned all of this straight from Tinder CEO Sean Rad, which would suggest he was at the very least aware of Terrill’s investigation. Dell warned Wolfe that Terrill’s article was drawing on unprecedented access to the very men who she’d said tormented her at Tinder—it immediately looked like a covert attempt to smear her (and her company) without breaking their mutual non-defamation agreement.

Text messages from Dell, obtained and reviewed by Gawker, show Tinder had put Terrill in touch with her. In one exchange, Dell wrote to Tinder’s head of communications, Rosette Pambakian: “What’s going on with Ashley... I think Sean [Rad] had her call me,” to which Pambakian replied “All Good things” and “She has evidence to nail WW [Whitney Wolfe].” When Dell asked why Ashley would want to talk to her, Pambakian responded “I think Sean just told her to call you.”



*Rosette Pambakian and Sean Rad*

In a later text exchange, Dell warned Wolfe: “they want me to give quote [sic]” to Ashley. Although Dell had ostensibly reached out to warn Wolfe, an on-again-off-again friend, she appeared deeply worried for herself as well: “Physically Sean is scarier but Rosette I feel like fucks up people’s lives,” she said in one text. “It’s scaring me so much,” as was the possibility that her attachment to any controversy would reach her “dad or something omg.”

She seemed to be frightened for both her reputation and her safety. When Wolfe asked Dell “why and what” she was afraid might happen, she said “Them saying abusive things to me. Sean grabbing me and like physically forcing information out of me. Them talking bad about me to ruin my image and life like they’re trying to do to you” When I contacted Dell, to ask about her involvement in Terrill’s story, she replied “What Story? Hm Im [sic] not familiar.” A request to speak with Sean Rad for this story was not answered; there is no evidence that Dell’s fears were realized.

Wolfe’s panic was compounded by the fact that her role as a CEO required near-constant travel between New York, Los Angeles, and her home in Austin. She’d been told that Terrill’s takedown could appear as a magazine article, a book, or possibly even a film, all aimed at portraying her as the villain in the Tinder breakup. Wolfe was unsure of what could be used against her, but scoured a year’s worth of texts and emails for any time she might’ve self-incriminated.

All the while, she was emphatic that she was not intending to defame or disparage Tinder, its employees, or parent company IAC. It was a refrain she told to me over the phone so many times, it could’ve only been out of a lawyer-mandated abundance of caution. On multiple occasions I had to assure Wolfe that I wasn’t recording our phone calls, and to provide some reassurance for her, we soon switched (at my suggestion) to a variety of encrypted IM apps that would auto-delete our correspondence.

Jen Stith, Whitney Wolfe’s head of communications at Bumble, suggested one ulterior motive: Ashley Terrill is good friends with Tinder’s current PR chief, Rosette Pambakian, a connection Stith insinuated could explain the entire renewed interest in the truthfulness of Whitney Wolfe. “Given the information I’m aware of, it would be strange if there was no influence,” Stith told me cryptically in one phone conversation. “We don’t want to speculate, but the relationship between Tinder executives and Ashley Terrill is chronicled on social media, and not private information, and does suggest that they are more than business associates.”